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October 4, 2021

**Via ECF**

The Honorable Analisa Torres  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 15D  
New York, NY 10007

Re: **Linda Alde v. Project 1920, Inc.**  
**Case No. 21-cv-6592-AT**  
**Motion to Adjourn Deadline to File Joint Letter**

Dear Judge Torres:

The undersigned represents Linda Slade, the Plaintiff in the above-referenced case. In accordance with Rule 1.C of Your Honor's Individual Practices, I write to request an adjournment of the October 4, 2021 deadline to submit a Joint Letter and a Jointly Proposed Case Management Plan and Scheduling Order.

On September 3, 2021, we served the registered agent of Project 1920, Inc. with the Summons and Complaint. We have yet to hear from them. As the deadline to respond expired, we attempted to advise them of the filing by other means – email to their offices and regular mail.

As Defendant has not yet appeared in the case, Plaintiff respectfully requests that the deadline to file the Joint Letter and Joint Proposed Scheduling Order be adjourned for thirty (30) days. If Defendant does not appear by the expiration of the thirty (30) period, then Plaintiff requests permission to move for a default judgment. No prior request has been made for this relief.

Respectfully submitted,



Dan Shaked, Esq.

cc: Project 1920, Inc.

**GRANTED.** By **November 4, 2021**, the parties shall submit their joint letter and proposed case management plan, or Plaintiff shall move for default judgment in accordance with Attachment A of the Court's Individual Practices in Civil Cases.

SO ORDERED.

Dated: October 5, 2021  
New York, New York

  

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**ANALISA TORRES**  
United States District Judge